

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

In re:)
) Case No:09-00830-jw
Lori Boykin) Chapter 13
)
Debtor(s)) Application for Approval of Chapter 13 Attorney Fees
)
/

Pursuant to Operating Order 07-12, I hereby request payment of attorney fees and costs as set forth below and represent to the court as follows:

1. This request for payment is expressly authorized by a conspicuous provision of a written fee agreement filed with the court and incorporated herein.

2. Pursuant to Operating Order 07-12, I hereby request payment of the following fees and expenses (only mark sections applicable to this request):

a. Expedited Fee Amount (paragraph 1)

\$ 3135.00

b. Supplemental Fees Before Confirmation (paragraph 2(a)(i))

\$ _____

c. Supplemental Fees After Confirmation (paragraphs 2(a)(ii) or (2)(b))

\$ 500.00

d. Alternative Procedure Fees (paragraph 3)

\$ _____

3. Fees and expenses set forth above total \$ 3635.00 (\$3600.00 attorney fee plus \$35.00 cost paid to 3rd party for credit reports), which includes all amounts charged through the date hereof. I have received \$ 925.00 (\$35.00 of this went for credit reports paid to 3rd party) in attorney fees and costs directly from the debtor. I request that the remaining amount of \$ 2710.00, be paid through the Chapter 13 plan.

4. For all requests for Supplemental Fees or amounts claims pursuant to the Alternative Procedure, include a detailed description of the services rendered, the time expended, and the amounts requested in this application: communication with client regarding her change in circumstances and her desire to give up vehicle, review of debtor's paystubs and case via trustee's web-site, communication with trustee's office, preparation of and filing of amended Schedules I & J, and preparation, filing and serving amended plan, preparation of amended Disclosure Statement and fee application.

Date: 9/2/09

/s/ C. Jennalyn Dalrymple

C. Jennalyn Dalrymple, #6724

Attorney for Debtor(s)

King & Dalrymple, P.A

829 Meeting Street

West Columbia, SC 29169

(803) 794-3311

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

In re:)
Lori Boykin) Case No:09-00830-jw
) Chapter 13
)
Debtor(s)) Certificate of Service
_____)

I, C. Jennalyn Dalrymple, Esq., Attorney for Debtor(s), hereby certify that a copy of the Application for Approval of Chapter 13 Attorney Fees and amended Disclosure of Compensation of Attorney for Debtor(s) was served on the Debtor(s) and the Trustee by depositing a copy of the Application in the United States Mail with appropriate postage affixed thereto, or by electronic service to trustee.

Date: 9/2/09

/s/ C. Jennalyn Dalrymple
C. Jennalyn Dalrymple, #6724
Attorney for Debtor(s)
King & Dalrymple, P.A
829 Meeting Street
West Columbia, SC 29169
(803) 794-3311
(803) 791-1090 fax
kdbankruptcy@aol.com

Debtor: Lori Boykin

Trustee: William K. Stephenson, Jr.

Document Page 3 of 4
United States Bankruptcy Court
DISTRICT OF SOUTH CAROLINA

In re **Lori Boykin**

Debtor(s)

Case No. 09-00830Chapter **13**

AMENDED DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Bankruptcy Rule 2016(b), I certify that I am the attorney for the above-named debtor and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept.....	\$	<u>3,635.00</u>
Prior to the filing of this statement I have received.....	\$	<u>925.00</u>
Balance Due.....	\$	<u>2,710.00</u>

2. The source of the compensation paid to me was:

☒ Debtor ☐ Other (specify):

3. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify):

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:
- Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
 - Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
 - Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
 - [Other provisions as needed]

\$35.00 of the \$925.00 paid was applied to due diligence costs paid to a third party.

6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

The above disclosed fee excludes representation of the debtor(s) in adversary proceeding or appeals. Other services may be provided pursuant to the Supplemental Fee Agreement entered into between the debtor[s] and the undersigned Attorney for additional work necessary as a result of any matters involving the default under or variance from the terms of the confirmed plan or for other complicating factors not present in the typical case.

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

Dated: **September 2, 2009**

/s/ C. JENNALYN DALRYMPLE

C. JENNALYN DALRYMPLE 6724

KING & DALRYMPLE, P.A.

829 MEETING STREET

WEST COLUMBIA,, SC 29169

(803) 794-3311 Fax: (803) 791-1090

KDBANKRUPTCY@AOL.COM

SUPPLEMENTAL FEE AGREEMENT - Subject to change after notice

New Law

[Sometimes clients require services that are not part of a standard Bankruptcy. The fees below are "standard fees" for extra services. Special circumstances may make it necessary to charge a different fee because of extra work that may be needed].
IF I/WE REQUIRE THESE SERVICES IN MY/OUR CASE, I/WE AGREE TO PAY KING & DALRYMPLE, P.A. FOR THESE SERVICES, EITHER IN ADVANCE FOR THESE SERVICES, OR WILL ALLOW THEM TO FILE A PROOF OF CLAIM/FEE APPLICATION IN MY/OUR CHAPTER 13 BANKRUPTCY CASE. 27-09

Failure to attend Creditor's Meeting at the scheduled time	\$200.00
Adding a Creditor/co-debtor after the Petition has been filed	\$26 court fee plus \$100 attorney fee for 1, +\$50 ea. additional
Sending letter to creditor: if they continue to contact client after client files bankruptcy/for return of money/for title/etc.	\$65.00
Re-sending notices to creditors when returned due to incorrect address	\$ 35.00
Defending a Motion to Dismiss for not paying Trustee. (add \$100 if a hearing is required)	\$150.00
Defending a Motion to Dismiss/Compel for not filing or not paying taxes due after filing	\$250.00
Defending a Motion to Dismiss filed by creditor (add \$100 if a hearing is required)	\$250.00
Defending a Motion to lift Stay (lift bk. protection) for not making payments owed on house/ car / etc. outside of the Plan or for not keeping insurance on a car or home. (add \$100 if a hearing is required)	\$400.00
Filing Motion for Substitution of Collateral (add \$100 if a hearing is required)	\$550.00
Filing a Motion/Consent Order for moratorium or lift stay /Family Ct./IRS/ etc. (add \$100 if hearing required)	\$250.00
Filing a Motion to sell real property (add \$100 if a hearing is required)	\$400.00
Filing a Motion to incur secured debt (add \$100 if a hearing is required)	\$350.00
Filing Motion to abandon property /Motion to Dismiss/Motion to Avoid Lien (add \$100 if a hearing is required)	\$250.00
Evaluating feasibility of converting to Ch 7 /lowering payments/file review	\$150.00
Filing Modified Plan due to lifting of stay or sale/ surrender of an asset/to reduce payment because Client(s) circumstances have changed/to add an omitted debt/to correct client error/other misc. reasons	\$400.00
Filing schedule/amended schedule due to client error / omission/ change in circumstances/conversion	\$225.00(per schedule)
Filing a Motion to divide a joint case. *Plus Court fee of 1/2 filing fee.	*\$400.00
Filing a Motion to convert from Chapter 13 to 7. *Plus \$25.00 Court fee	*\$750.00
Filing a Motion to reconsider or reinstate after Order of Dismissal	\$400.00
Filing Motion to reconsider after Default on 362 Consent Order/Resumption of Trustee payments	\$450.00
Filing a Motion for Hardship Discharge	\$400.00
Filing an Objection to a claim, return to Trustee's objection to claim, or Motion to Restrict Public Access	\$300.00
Filing a Proof of Claim when required due to creditor's failure to file claim(*\$200.00 add. fee if trustee objects)	*\$200.00
Filing a Notice of Settlement for litigation handled by another law firm	\$400.00
Filing an Application for Appointment of Professional	\$400.00
Office visit for consultation with attorney after case is filed	\$125.00
Handling contested matters & litigation against/for client (including alleged fraud/claims validity/extended negotiations after 362 Default, etc.)(requires a 2 hour retainer) [DOES NOT INCLUDE ADVERSARIES]	hourly @ \$200.00
Handling post-discharge/post dismissal matters/enforcing stay (requires \$400.00 retainer)	hourly @ \$200.00
Failure to keep any appointment <u>unless</u> client has phoned 24 hrs. prior to scheduled appointment time	\$100.00
Extended negotiations by attorney on behalf of client (requires \$400.00 retainer)	hourly @ \$200.00
Extended negotiations by staff on behalf of client. Examples: helping client reconstruct the number of payments made to creditor or trustee, contacting client regarding the need to make payments due outside the Plan, the need to obtain insurance, the need to surrender collateral, etc.	\$50.00

NOTE: These services may be billed hourly at \$50.00 per hour if services are protracted.

A file retrieval fee of \$50.00 will be charged when clients request a copy of their petition, schedules, statement and any other documents previously sent to them. \$150.00 will be charged if the case has been dismissed or discharged.

NOTE: A fee for postage and copies is added for all of the above services when creditors have to be notified(\$50.00 if less than 50 creditors or parties in interest /\$100.00 if over 50 creditors or parties in interest.)

CLIENT AGREES TO NOTIFY THIS OFFICE IMMEDIATELY IF ADDRESS OR PHONE # CHANGES

Date: 27-09 Client Agreement: [Signature] Client Agreement: _____